IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS MIDLAND/ODESSA DIVISION

VIRTAMOVE, CORP.,

Plaintiff,

v.

Case No. 7:24-CV-00030-ADA-DTG

AMAZON.COM, INC.; AMAZON.COM SERVICES LLC; AND AMAZON WEB SERVICES, INC.,

Defendants.

JOINT MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO ANSWER OR OTHERWISE RESPOND TO DEFENDANTS' COUNTERCLAIMS

Plaintiff VirtaMove Corp. ("Plaintiff") and Defendants Amazon.com, Inc., Amazon.com Services, LLC and Amazon Web Services, Inc. ("Defendants") hereby jointly move for a two-week extension of time for Plaintiff to answer or otherwise respond to the counterclaims alleged in Defendants' Answer to Plaintiff's First Amended Complaint for Patent Infringement. Dkt. 46.

Plaintiff's deadline to answer or otherwise respond to the counterclaims is currently July 26, 2024 and, with this two-week extension, the deadline would be August 9, 2024. This extension is necessary because Plaintiff is investigating new allegations raised for the first time in the counterclaims.

Counsel for the parties have conferred and all parties stipulate to this extension.

Accordingly, the parties request that the Court grant the motion and enter the attached proposed Order.

Dated: July 19, 2024

By: /s/ Daniel B. Kolko

Reza Mirzaie (CA SBN 246953) rmirzaie@raklaw.com Marc A. Fenster (CA SBN 181067) mfenster@raklaw.com Neil A. Rubin (CA SBN 250761) nrubin@raklaw.com James A. Milkey (CA SBN 281283) imilkey@raklaw.com Amy E. Hayden (CA SBN 287026) ahayden@raklaw.com Jacob Buczko (CA SBN 269408) ibuczko@raklaw.com James Tsuei (CA SBN 285530) itsuei@raklaw.com Christian W. Conkle (CA SBN 306374) cconkle@raklaw.com

Jonathan Ma (CA SBN 312773)

ima@raklaw.com

Daniel B. Kolko (CA SBN 341680)

dkolko@raklaw.com

RUSS AUGUST & KABAT

12424 Wilshire Boulevard, 12th Floor Los Angeles, CA 90025 Telephone: (310) 826-7474

Qi (Peter) Tong (TX SBN 24119042)

RUSS AUGUST & KABAT

4925 Greenville Ave., Suite 200

Dallas, TX 75206

Telephone: (310) 826-7474

Attorneys for Plaintiff VirtaMove, Corp.

Respectfully submitted,

/s/ Jeremy A. Anapol

Joseph R. Re (Pro Hac Vice) Jeremy A. Anapol (Pro Hac Vice)

KNOBBE MARTENS OLSON & BEAR LLP

2040 Main Street, 14th Floor

Irvine, CA 92614

Telephone: 949-760-0404 Facsimile: 949-760-9502 joe.re@knobbe.com

jeremy.anapol@knobbe.com

Colin B. Heidman (Pro Hac Vice) Christie R.W. Matthaei (Pro Hac Vice) Logan P. Young (Pro Hac Vice)

KNOBBE MARTENS OLSON & BEAR LLP

925 4th Ave, Ste 2500 Seattle, WA 98104

Telephone: 206-405-2000 Facsimile: 206-405-2001 colin.heideman@knobbe.com christie.matthaei@knobbe.com logan.young@knobbe.com

Counsel for Defendants Amazon.com, Inc., Amazon.com Services, LLC and Amazon Web Services, Inc.

CERTIFICATE OF SERVICE

I certify that on July 19, 2024, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Daniel Kolko
Daniel Kolko